

ORIGINAL

INTERVENTION



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BEFORE THE ARIZONA CORPORATION

COMMISSIONERS

GARY PIERCE, Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

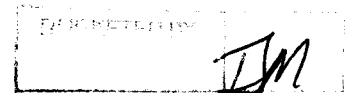
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Arizona Corporation Commission

DOCKETED

OCT 26 2012



IN THE MATTER OF THE APPLICATION OF)
TUCSON ELECTRIC POWER COMPANY FOR)
THE ESTABLISHMENT OF JUST AND)
REASONABLE RATES AND CHARGES)
DESIGNED TO REALIZE A REASONABLE)
RATE OF RETURN ON THE FAIR VALUE OF)
ITS OPERATIONS THROUGHOUT THE STATE)
OF ARIZONA.)

DOCKET NO. E-01933A-12-0291

APPLICATION FOR LEAVE TO
INTERVENE

I.

INTRODUCTION

Pursuant to A.A.C. R14-3-105 the Southern Arizona Water Users Association ("SAWUA"), an Arizona non-profit corporation, hereby submits its Application for Leave to Intervene ("Application") in the above-captioned and above-docketed proceeding ("Instant Proceeding"). In support of its Application, SAWUA submits the following information.

II.

IDENTITY OF APPLICANT

SAWUA was incorporated in the State of Arizona on January 3, 2000 as a non-profit corporation. SAWUA is also a Section 501(C)(6) corporation under the United States Internal Revenue Code. In that regard, SAWUA's Articles of Incorporation indicate that it was initially formed for the following purposes:

"(1) To discuss, analyze and recommend ways to preserve and enhance the quality and quantity of Southern Arizona's water resources;

1 (2) To exercise leadership and initiative to determine and
2 encourage the most effective management of the region's
sustainable supplies of quality water;

3 (3) To discuss and analyze federal, state, regional and local
water resource management, policy and planning;

4 (4) To consult, coordinate and cooperate in the
development of effective water resource policy and planning; and

5 (5) To ensure appropriate policies and programs are in
6 place to protect the quantity and quality of water resources within
and available to Southern Arizona."

7 In subsequent years, SAWUA's membership activities have included a wide array of
8 subjects relating to their respective roles as providers of water services in that portion of
9 Southern Arizona which SAWUA's members serve. At present, SAWUA's members in the
10 aggregate provide services to several hundred thousand customer connections.¹

11 **III.**

12 **SAWUA'S MEMBERS COULD BE SUBSTANTIALY AND**
13 **DIRECTLY AFFECTED BY A COMMISSION DECISION**
14 **IN THE INSTANT PROCEEDING**

15 On July 2, 2012 TEP filed a request with the Commission for an increase in its rates and
16 charges for electric service, which filing occasioned the initiation of the Instant Proceeding.
17 Therein TEP submitted various proposals relating to an increase in its rates and charges for
18 electric service, consolidation of certain rate schedules and changes in rate design.

19 Electric rates represent a significant operating expense for SAWUA's members in
20 connection with their respective operations. Based upon a review of TEP's July 2, 2012
21 Application and supporting schedules and prepared testimony, it appears that some (if not all) of
22 SAWUA's members could experience a significant increase in their respective operating
23 expenses if TEP's aforementioned proposals regarding an increase in rates, rate consolidation
24

25
26 ¹ SAWUA's current members are as follows: Avra Water Co-Op, BKW Farms, Community Water Company of
27 Green Valley, FICO/Farmers Water Co., Flowing Wells Irrigation District, Green Valley Domestic Water
28 Improvement District, Kai Farms, Town of Marana Municipal Water System, Metro Water District, Oro Valley
Water Utility, Pima County Regional Wastewater Reclamation Department, Red Rock Utilities, L.L.C., Sahuarita
Water Company, Town of Sahuarita Wastewater and Tucson Water Department. In that regard, Pima County and
Town of Sahuarita provide wastewater (and non water) services in the service areas of various members of
SAWUA.

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1 and rate design are adopted. Accordingly, SAWUA and its members could be substantially and
2 directly affected by a Commission decision in the Instant Proceeding.

3 **IV.**

4 **SAWUA'S INTERVENTION WOULD NOT DELAY THE**
5 **INSTANT PROCEEDING OR UNDULY BROADEN ISSUES**

6 As of this juncture, SAWUA does not anticipate a need to raise any new matters. Rather,
7 it contemplates participating in the proceeding and addressing to the extent necessary those
8 questions and/or issues (i) which may exist at this time as a result of TEP's Application and
9 supporting schedules and supporting testimony, and/or (ii) which may hereafter be raised by the
10 Commission's Staff and/or other parties. Thus, its intervention will not unduly broaden the
11 issues to be considered.

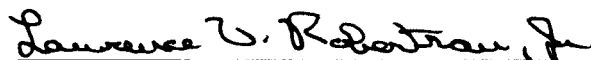
12 **V.**

13 **CONCLUSION**

14 Based upon the foregoing, SAWUA believes that it has satisfied the requirements for
15 intervention set forth in A.A.C. R-14-3-105. Accordingly, it requests that an appropriate order of
16 the Commission be issued granting SAWUA's Application, and according SAWUA all rights as
17 a party of record in the instant proceeding.

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19 Dated this 25th of October 2012.

20
21 Respectfully submitted,

22 

23 Lawrence V. Robertson, Jr.
24 Of Counsel to Munger Chadwick, P.L.C.
25 Attorney for Southern Arizona Water Users
Association

26 The original and thirteen (13) copies of the
27 foregoing Application will be mailed for filing
28 this 25th day of October 2012 to:

1 Docket Control
2 Arizona Corporation Commission
3 1200 West Washington Street
4 Phoenix, Arizona 85007

5 A copy of the foregoing Application has been
6 emailed or will be mailed this same date to:

7 Jane L. Rodda, Administrative Law Judge
8 Hearing Division
9 Arizona Corporation Commission
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11 Tucson, Arizona 85701

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